

ORIGINAL



0000131041

BEFORE THE ARIZONA CORPORATION COMMISSION

GARY PIERCE
Chairman

BOB STUMP
Commissioner

SANDRA D. KENNEDY
Commissioner

PAUL NEWMAN
Commissioner

BRENDA BURNS
Commissioner

2011 NOV -8 P 3:55

AZ CORP COMMISSION
DOCKET CONTROL

Arizona Corporation Commission

DOCKETED

NOV 8 2011

DOCKETED BY

IN THE MATTER OF:

GEORGE BIEN-WILLNER, for GLENDALE &
27TH INVESTMENTS, LLC,

COMPLAINANT,

v.

QWEST CORPORATION,

RESPONDENT.

DOCKET NO. T-01051B-10-0200

NOTICE OF FILING

Please take notice that Qwest Corporation hereby files the attached response letter
addressed to Glendale & 27th Investments, LLC.

RESPECTFULLY SUBMITTED, this 8th day of November, 2011.

QWEST CORPORATION d/b/a CENTURYLINK

Norman G. Curtright
Associate General Counsel
20 E. Thomas Road, 1st Floor
Phoenix, Arizona 85012
Telephone: (602) 630-2187

1 ORIGINAL and thirteen (13) copies filed
2 this 8th day of November, 2011, with:
3 Docket Control
4 ARIZONA CORPORATION COMMISSION
5 1200 West Washington Street
6 Phoenix, Arizona 85007

7 Copy of the foregoing sent via e-mail and
8 U.S. Mail this 8th day of November, 2011, to:

9 Steve M. Olea, Director
10 Utilities Division
11 ARIZONA CORPORATION COMMISSION
12 1200 West Washington Street
13 Phoenix, Arizona 85007

Janice Alward, Chief Counsel
Legal Division
ARIZONA CORPORATION COMMISSION
1200 West Washington Street
Phoenix, Arizona 85007

George Bien-Willner
GLENDALE & 27TH INVESTMENTS, INC.
3641 North 39th Avenue
Phoenix, Arizona 85019

14 
15
16
17
18
19
20
21
22
23
24
25

Norman G. Curtright
Associate General Counsel
20 East Thomas Road - 1st Floor
Phoenix, Arizona, 85012

Office: 602-630-2187
Fax: 602 630 5337
Norm.Curtright@centurylink.com



November, 7, 2011

Mr. George Bien-Wilner
Glendale & 2th Investments LLC
3641 N. 39th Avenue
Phoenix, Arizona

Re: Docket No. T-01051B-10-0200

Dear Mr. Bien-Wilner:

In response to your letter dated October 28, 2011:

Response to your paragraph number 1. The matters withheld have not been produced for the reason that: (a) the subject of the withheld materials bears no relationship to the claims made in your Amended Complaint; or (b) are confidential communications with legal counsel for the purposes of providing legal advice and defense. The subjects of the materials withheld for lack of relevancy are services other than an "800 service" alleged in your Amended Complaint, and account numbers other than the account number identified by your Amended Complaint.

As Qwest has stated, there is no 800 service billed under account number 602-275-4990. Qwest has produced the materials related to that account and the communications with your firm and the Commission personnel related to your 800 service allegations. An examination of the other account numbers you have previously identified as associated with the hotel does not show an 800 service. Production of records regarding such other services and accounts will not tend to make any of your allegations regarding an 800 service more probable.

Response to your paragraph number 2. "CenturyLink Legal" responses are made by legal counsel for the Respondent, including the undersigned. Those responses are objections made to your data requests, for the reasons stated above.

Response to your paragraph number 3. Qwest objects for the following reasons: The documents which are printouts from computer systems are the only print formats available from those systems, and are the same that company personnel would use when paper prints are used. The format is typically a "screen shot," meaning that the format is the same as that which appears electronically at a system terminal, and is the format that company personnel see when

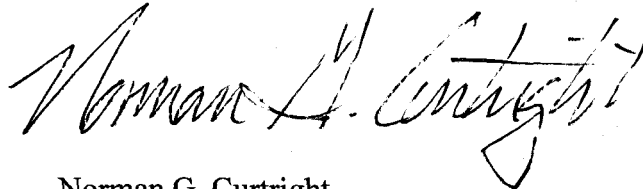
performing their job functions. The format cannot be changed without programming work that would have to be performed specifically for your request. Company personnel are trained to work with the systems. If you have specific questions I suggest that you ask them and we will endeavor to explain the materials. However, we are not required to re-format the information. Because of security and privacy requirements for our systems, we cannot agree to give you access to the systems.

Response to your paragraph number 4. Please direct your attention to Qwest's response sent to you on October 11, 2011, number 34. The attachments include the bills for 602-275-4990 for February-June, 2005, in accordance with your request.

Response to your paragraph number 5. Qwest answered the data requests that relate directly or indirectly to the allegations made in your Amended Complaint regarding a supposed 800 number and account number 602-275-4990. The data requests that seek information regarding services and accounts that are not related to a supposed 800 number or to account number 602-275-4990 are irrelevant. See also, response to paragraph number 1, above.

Your letter asks me to call you regarding the issues listed above. I will send this written response first, so that our talk might be more productive. Your letter also states that you would like to discuss other discovery with me, which I take to mean matters other than those mentioned in your October 28, 2011 letter. I propose that we have that discussion at the same time.

Sincerely,

A handwritten signature in black ink, appearing to read "Norman G. Curtright". The signature is fluid and cursive, with a large, stylized "N" and "C".

Norman G. Curtright
Associate General Counsel
Qwest Corporation d/b/a CenturyLink
20 E. Thomas Road, 1st Floor
Phoenix, Arizona 85012